

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Hearing Date: 2/26/2025 at 10:30 AM ET

Re: D.I. No.:1962

**LIMITED OBJECTION AND RESERVATION OF RIGHTS OF PARFUMS DE COEUR
REGARDING DEBTORS' MOTION REGARDING ADMINISTRATIVE EXPENSE
CLAIMS PROCEDURES**

Parfums de Coeur ("PDC"), by and through the undersigned counsel, files this Limited Objection and Reservation of Rights with respect to the Debtors' Motion Regarding Administrative Expense Claims Procedure ("Limited Objection"). In support of the Limited Objection, PDC states as follows:

Paragraph 23 of the Debtors' Proposed Order "authorizes" but does not require the Debtors' to commence making payments to holders of undisputed Pre-Closing Administrative Expense Claims and set aside a reserve for disputed claims. Given that the claimants such as PDC are being requested to follow the Debtors' procedure with respect to their administrative claims, and giving up their right to argue their motions for such claims, the Debtors' Order should actually "require" the Debtors to commence making such payments to undisputed administrative claims and setting aside reserves for disputed administrative claims as the case may be.

¹ The debtors and debtors in possession in these chapter 11 cases (hereafter, "**Debtors**") are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277).

PDC reserves all of its rights to amend this Limited Objection prior to the hearing on this matter.

Dated: 2/19/25

ELLIOTT GREENLEAF, P.C.

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